

## **REMARKS**

The present invention is a mobile terminal device, a part of a housing of a mobile terminal device which is detachable from the mobile terminal device, a means for changing optical properties of a lens module of a camera system of a mobile device, a method for changing optical properties of a lens module of a camera system of a mobile terminal device and a system for changing optical properties of a lens module of a camera system. A mobile terminal device 1, including a camera system 20 in accordance with an embodiment of the invention, includes a lens module and a part 38.1, 38.2 or 38.3 of said mobile device which is detachable from the mobile terminal wherein said part of a housing comprises means for changing optical properties as described, for example, in paragraph [0152] - [0153] with the means being adapted to cooperate with the lens module of the camera system.

Claim 30 stands objected to regarding "said housing" in line 2. Claim 30 has been cancelled.

Claims 1, 3, 5, 7-10, 13, 15-18, 20, 23-25 and 36 stand rejected under 35 U.S.C. §102 as being anticipated by United States Patent 6,775,361 (Arai et al). These grounds of rejection are traversed with respect to newly submitted claims 37-105 which substantively recite a mobile terminal device including a camera system as recited in claims 37-44, a part of a housing of a mobile terminal device which is detachable from said mobile terminal device as recited in claims 45-54, means for changing optical properties of a lens module of a camera system of a mobile terminal device as recited in claims 55-60, a method for changing optical properties of a lens module of a camera system of a mobile terminal device

as recited in claims 61-65 and a system for changing optical properties of a lens module of a camera system as recited in claims 66-105 which recite the combination of a part of a housing of a mobile terminal device which is detachable from the mobile terminal device and includes means for changing optical properties of the lens module which has no counterpart in Arai et al. Arai et al disclose a telephone and video camera in a single housing. See the Abstract. As may be seen with reference to Fig. 10, the camera is integrated within the device and does not contain the subject matter of the independent claims pertaining to part of the housing of the mobile device which is detachable from the mobile terminal device comprising the changing of optical properties of a lens module of the camera. Accordingly, it is submitted that newly submitted claims 37-105 are not anticipated by Arai et al.

Claims 2, 4, 11-12, 19 and 21 stand rejected under 35 U.S.C. §103 as being unpatentable over Arai et al in view of United States Patent 6,373,524 (Suda et al). These grounds of rejection are traversed for the following reasons.

The deficiencies of Arai et al have been discussed above with regard to there being no teaching therein regarding a part of the housing of the mobile device which is detachable from the mobile terminal device comprising changing optical properties of the lens module which is part of the camera system. While Suda et al do disclose an interchangeable lens assembly 127, the lens assembly is removable from the camera main body 128 to allow different interchangeable lens assemblies to be attached. However, there is no teaching therein regarding the detachable part of the housing as set forth in the claims as amended. Accordingly, if the proposed combination of Arai et al and Suda et al were made, the subject matter of the newly submitted claims would not be achieved.

Claims 6, 14, and 22 stand rejected under 35 U.S.C. §103 as being unpatentable over Arai et al in view of United States Patent 6,081,384 (Takayama et al). These grounds of rejection are traversed with respect to newly submitted claims 26-94. Takayama et al have been cited as teaching a digital camera having means for changing optical properties. However, Takayama et al do not cure the deficiencies noted above with respect to Arai et al pertaining to the detachable part of the housing. Accordingly, if the proposed combination were made, the subject matter of the newly submitted claims would not be achieved.

Claims 26, 29, 31 and 33-35 stand rejected under 35 U.S.C. §103 as being unpatentable over Arai et al in view of United States Patent 6,292,212 (Zigadlo et al). These grounds of rejection are traversed with respect to claims 37-105. Zigadlo et al have been cited as teaching an optical assembly located in front of the lens module. Zigadlo et al would not suggest to a person of ordinary skill in the art to modify Arai et al to arrive at the subject matter of the newly submitted claims involving a part of the housing of the mobile device which is detachable from the mobile device and comprises means for changing or changing optical properties of the lens assembly as recited in the claims.

Claims 27-28 and 30 stand rejected under 35 U.S.C. §103 as being unpatentable over Arai et al in view of Zigadlo et al and Suda et al. These grounds of rejection are traversed with respect to the newly submitted claims. These grounds of rejection are traversed with respect to claims 37-105.

The deficiencies of Arai et al, Zigadlo et al and Suda et al have been discussed above. It is submitted that a person of ordinary skill in the art would not

modify the teachings of Arai et al in view of Zigadlo et al and Suda et al to arrive at the subject matter of the newly submitted claims except by impermissible hindsight.

Claim 32 stands rejected under 35 U.S.C. §103 as being unpatentable over Arai et al in view of Zigadlo et al and Takayama et al. These grounds of rejection are traversed with respect to claims 37-105. The deficiencies of Arai et al, Zigadlo et al and Takayama et al have been discussed above. It is submitted that a person of ordinary skill in the art would not be led to modify the teachings of Arai et al, Zigadlo et al and Takayama et al to arrive at the subject matter of the newly submitted claims.

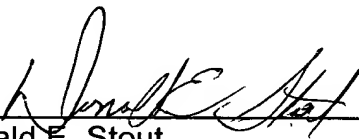
In view of the foregoing amendments and remarks, it is submitted that each of the claims in the application is in condition for allowance.

Accordingly, early allowance thereof is respectfully requested.

To the extent necessary, Applicants petition for an extension of time under 37 C.F.R. §1.136. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 01-2135 (1123.40878X00) and please credit any excess fees to such Deposit Account.

Respectfully submitted,

ANTONELLI, TERRY, STOUT & KRAUS, LLP

  
\_\_\_\_\_  
Donald E. Stout  
Registration No. 26,422  
(703) 312-6600

Attachments

DES:dlh